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ELECTRONICALLY FILED

*Attorneys for Defendant and Third-Party/Counterclaim-Plaintiff
Infinity Broadcasting Corporation of Washington, D.C. n/k/a
CBS Radio Inc. of Washington, D.C.*

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X	
SAMUEL L. JONES JR.,	:
	:
Plaintiff,	: No. 07 Civ. 5693 (BSJ) (AJP)
	:
-against-	:
	:
INFINITY BROADCASTING CORPORATION OF	: DECLARATION OF
WASHINGTON, D.C. n/k/a CBS RADIO INC. OF	: <u>JEREMY FEIGELSON</u>
WASHINGTON, D.C.,	:
	:
Defendant.	:
	:
-----X	
INFINITY BROADCASTING CORPORATION OF	:
WASHINGTON, D.C. n/k/a CBS RADIO INC. OF	:
WASHINGTON, D.C.,	:
	:
Counterclaimant and Third-Party Plaintiff,	:
	:
-against-	:
	:
SAMUEL L. JONES JR.,	:
	:
Counterclaim Defendant, and	:
	:
RADIO ONE, INC.,	:
	:
Third-Party Defendant.	X

Jeremy Feigelson declares:

1. I am a member of the bar of the State of New York, a member of the bar of this Court, and a member of Debevoise & Plimpton LLP, counsel to defendant Infinity Broadcasting Corporation of Washington, D.C. n/k/a CBS Radio Inc. of Washington, D.C. (“CBS Radio”) in this matter. I make this Declaration on personal knowledge in support of CBS Radio’s application for a temporary restraining order and preliminary injunction, and for the issuance of an order to show cause.

2. I and other counsel for CBS Radio have communicated with counsel for plaintiff/counterclaim defendant Samuel Jones Jr. and for third-party defendant Radio One, Inc. (“Radio One”) in an effort to avoid today’s application. That effort has been unsuccessful. In particular, opposing counsel has advised that Mr. Jones will continue to play the “HUGGY LOWDOWN” character on-air at Radio One’s station, WMMJ-FM, while this matter is pending.

3. Counsel for Mr. Jones and Radio One are aware of CBS Radio’s intention to seek preliminary relief. Stephen Sussman, Esq. is counsel of record for Mr. Jones and has advised that he also will accept service of papers for Radio One. I have spoken with Mr. Sussman and advised him of our intent to appear before Judge Jones this afternoon. Mr. Sussman indicated he would plan to appear as well.

4. No prior application has been made for the relief sought herein. For the reasons set forth in the moving papers, including but not limited to the irreparable commercial harm described in the Declaration of Samuel Rogers, I respectfully request that the Court proceed by Order to Show Cause in order to provide a prompt hearing of

this matter. The normal time periods governing motion practice in this district would not allow this Court to move quickly enough to avoid the irreparable injury that CBS Radio is suffering as a result of the conduct of Mr. Jones and Radio One.

5. Attached to this declaration are copies of prior pleadings that are relevant to CBS Radio's application. Exhibit 1 is a true and correct copy of the original Complaint, filed in this matter on June 14, 2007 but not served until July 13, 2007.

6. Exhibit 2 is a true and correct copy of the Amended Complaint, filed in this matter on July 16, 2007 and served on July 17, 2007.

7. Exhibit 3 is a true and correct copy of the Answer, Counterclaim and Third-Party Complaint filed by CBS Radio concurrently with this Declaration.

I declare under penalty of perjury that the foregoing is true and correct.

Executed at New York, New York this 20th day of July 2007.

/s/ Jeremy Feigelson
Jeremy Feigelson